

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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| In re: |) | |
| |) | Chapter 11 |
| LIGADO NETWORKS LLC, <i>et al.</i> , ¹ |) | Case No. 25-10006 (TMH) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| |) | |

**THE DEBTORS' *AMENDED*² WITNESS AND EXHIBIT LIST
FOR HEARING SCHEDULED FOR SEPTEMBER 3, 2025
AT 3:00 P.M. (PREVAILING EASTERN TIME)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully file this witness and exhibit list (the “Witness and Exhibit List”) identifying the individual(s) that the Debtors may call as witnesses and the exhibits the Debtors may introduce as evidence at the hearing to be held on September 3, 2025 at 3:00 p.m. (ET) (the “Hearing”) before the Honorable Thomas M. Horan, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

The Debtors reserve the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing, to call any witness on any other party’s witness list (regardless of whether that party removes that witness from its list), to call any witness necessary to authenticate documents (to the extent necessary), and to call any witness to provide rebuttal or impeachment testimony (as appropriate). The Debtors further reserve the right to ask the Court to take judicial

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors’ headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

² **Amended items appear in bold.**

notice of pleadings, transcripts, and/or documents filed in or in connection with the above-captioned cases, to offer rebuttal exhibits, and to modify, supplement, or amend this Witness and Exhibit List at any time prior to or during the Hearing. Designation of any exhibit below does not waive any objections the Debtors may have to any exhibit listed on any party's exhibit list or introduced at the Hearing.

WITNESSES

The Debtors may present the testimony of the following witnesses, by declaration, direct testimony or otherwise, at the Hearing:

A. Douglas Smith, Chief Executive Office of Ligado Networks LLC. The Debtors intend to rely on the following declaration submitted by Mr. Smith for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Smith at the Hearing:

a. *Declaration of Douglas Smith in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession*

B. Bruce Mendelsohn, a Partner at the Global Head of the Financing and Capital Solutions Group at Perella Weinberg Partners L.P. The Debtors intend to rely on the following declaration submitted by Mr. Mendelsohn for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Mendelsohn at the Hearing:

a. *Declaration of Bruce Mendelsohn in Support of Debtors' Motion for Entry of an Order (I) Approving the Amendment to the DIP Credit Agreement, (II) Approving the Letter Agreement and AST Power of Attorney, and (III) Granting Related Relief*

C. Jeriad R. Paul, Vice President of Omni Agent Solutions Inc. The Debtors intend to rely on the following declaration submitted by Mr. Paul for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Paul at the Hearing:

- a. *Declaration of Jeriad R. Paul Regarding the Solicitation and Tabulation of Votes On, and Elections to Opt Out of the Third Party Release Contained in, the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, and all exhibits attached thereto*

D. Michael Healy, a Senior Managing Director at FTI Consulting, Inc. The Debtors intend to rely on the following declaration submitted by Mr. Healy for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Healy at the Hearing:

- a. *Declaration of Michael Healy in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession*

The Debtors may call any witness listed or called by any other party and any rebuttal or impeachment witnesses.

EXHIBITS

| Ex. No. | Description | Docket No. (if available) |
|----------------|---|----------------------------------|
| 1. | [SEALED] <i>Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i> | 352 |
| 2. | [REDACTED] <i>Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i> | 359 |
| 3. | <i>Notice of Filing of Blackline of Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the</i> | 360 |

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| | <i>AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i> | |
| 4. | <i>Notice of Filing of Amendment to Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the AST Definitive Documents and (II) Granting Related Relief</i> | 559 |
| 5. | <i>Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i> | 348 |
| 6. | <i>Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 349 |
| 7. | <i>Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation, and (V) Granting Related Relief, including all exhibits attached thereto</i> | 350 |
| 8. | <i>Notice of Filing of Exhibits C and D (Projections and Liquidation Analysis) to the Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 424 |
| 9. | <i>Objection of the United States Trustee to Approval of Disclosure Statement</i> | 463 |
| 10. | <i>Debtors' Reply to the U.S. Trustee's Objection to the Disclosure Statement Motion and in Further Support Thereof, including all exhibits attached thereto</i> | 560 |
| 11. | <i>Notice of Filing Revised Order (I) Authorizing the Debtors to Enter into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i> | 651 |
| 12. | <i>Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i> | 652 |
| 13. | <i>Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 653 |
| 14. | <i>Notice of Filing of Blackline of Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 654 |

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| 15. | <i>Notice of Filing of Blackline of Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 655 |
| 16. | <i>Notice of Filing of Revised Order (I) Approving Proposed Disclosure Statement and Form and Manner of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation, and (V) Granting Related Relief, including all exhibits attached thereto</i> | 656 |
| 17. | <i>Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i> | 692 |
| 18. | <i>Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief, including all exhibits attached thereto</i> | 694 |
| 19. | <i>Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 696 |
| 20. | <i>Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 697 |
| 21. | <i>Notice of Blacklines of (I) Joint Chapter 11 Plan of Ligado Networks and Its Affiliated Debtors and Debtors in Possession and (II) Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 701 |
| 22. | <i>Objection of the United States Trustee to Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i> | 760 |
| 23. | <i>Objection by the United States of America to the Debtors' Joint Chapter 11 Plan of Ligado Networks, LLC</i> | 762 |
| 24. | <i>Debtors' Motion for Entry of an Order (I) Approving the Amendment to the DIP Credit Agreement, (II) Approving the Letter Agreement and AST Power of Attorney, and</i> | 764 |

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| | <i>(III) Granting Related Relief, including all exhibits attached thereto</i> | |
| 25. | <i>Declaration of Bruce Mendelsohn in Support of Debtors' Motion for Entry of an Order (I) Approving the Amendment to the DIP Credit Agreement, (II) Approving the Letter Agreement and AST Power of Attorney, and (III) Granting Related Relief</i> | 764-3 |
| 26. | <i>Declaration of Michael Healy in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i> | 917 |
| 27. | <i>Declaration of Jeriad R. Paul Regarding the Solicitation and Tabulation of Votes On, and Elections to Opt Out of the Third Party Release Contained in, the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, and all exhibits attached thereto</i> | 918 |
| 28. | <i>Declaration of Douglas Smith in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i> | 919 |
| 29. | <i>Debtors' Memorandum of Law in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i> | 916 |
| 30. | <i>Notice of Filing of Proposed Confirmation Order, and all exhibits attached thereto</i> | 920 |
| | Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases or related adversary proceedings | |
| | Any exhibit necessary to rebut the evidence of testimony of any witness offered or designated by any other party | |
| | Any exhibit listed by any other party | |

Dated: August 29, 2025
Wilmington, Delaware

/s/ Zachary J. Javorsky

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